

COOLEY LLP
MICHAEL A. ATTANASIO (151529)
(mattanasio@cooley.com)
BENEDICT Y. HUR (224018)
(bhur@cooley.com)
SIMONA AGNOLUCCI (246943)
(sagnolucci@cooley.com)
EDUARDO E. SANTACANA (281668)
(esantacana@cooley.com)
ARGEMIRA FLÓREZ (331153)
(aflorez@cooley.com)
NAIARA TOKER (346145)
(ntoker@cooley.com)
HARRIS MATEEN (335593)
(hmateen@cooley.com)
THILINI CHANDRASEKERA (333672)
(tchandrasedkera@cooley.com)
ISABELLA MCKINLEY CORBO (346226)
(icorbo@cooley.com)
CHELSEA HU (357212)
(chu@cooley.com)
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

Attorneys for Defendant
GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**GOOGLE LLC'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD BE
SEALED**

Dept: 3, 17th Fl.
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020
Trial Date: August 18, 2025

Pursuant to Civil Local Rules 7-11 and 79-5, Google LLC requests to file its Opposition to Plaintiffs' Motion to Quash the Subpoena of Susan Harvey under seal. Although Plaintiffs have not designated most of this material as confidential, the filings contain detailed discussions of Ms. Harvey's medical conditions. Google therefore files the entire Opposition package under seal out of an abundance of caution..

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Google's Opposition to Plaintiffs' Motion to Quash Subpoena to Susan Harvey	Plaintiffs	Entirety	References Plaintiffs' sensitive personal information
Exhibits A-E to Mateen Declaration	Plaintiffs	Entirety	References Plaintiffs' sensitive personal information
Exhibit A to Agnolucci Declaration	Plaintiffs	Entirety	References Plaintiffs' sensitive personal information

1 Dated: August 19, 2025

Respectfully submitted,

2 COOLEY LLP

3
4 By: /s/ Simona Agnolucci

5 Michael A. Attanasio

6 Benedict Y. Hur

7 Simona Agnolucci

8 Eduardo E. Santacana

9 Argemira Flórez

10 Harris Mateen

11 Isabella McKinley Corbo

12 Naiara Toker

13 Thilini Chandrasekera

14 Chelsea Hu

15 *Attorneys for Defendant*

16 *Google LLC*